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ADAM I. KLEINBERG

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September 22, 2020

VIA ECF

The Honorable Joanna Seybert
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1030
Central Islip, NY 11722

Re: *AA Medical P.C. v Khaled Almansoori*
Docket No. : 20-CV-03852 (JS)(ARL)
Our File No. : 200139

Dear Judge Seybert:

We represent defendant Khaled Almansoori, M.D. ("Dr. Almansoori"). We write to respectfully request an extension of time until October 14, 2020 for Dr. Almansoori to answer or otherwise respond to the Complaint filed by AA Medical, P.C. ("AA Medical"). Earlier today, I spoke to counsel for AA Medical, who was willing to agree to such an extension of time for Dr. Almansoori to answer, but only if Dr. Almansoori would waive the right to otherwise respond to the complaint.

Dr. Almansoori recently retained the undersigned counsel, as well as counsel in Chicago, Illinois (where Dr. Almansoori lives and works), to represent him in this matter. We submit this request for a number of reasons. First, Dr. Almansoori has only recently retained legal counsel to represent him in this matter, and seeks additional time for his legal counsel to familiarize themselves with this matter. Second, in the last two months, the plaintiff in this case, or one of its employees, has initiated not just this suit, but also the following five other lawsuits against Dr. Almansoori, with no explanation why the claims in these suits could not be asserted in fewer than six separate actions:

- *AA Medical, P.C. v. Khaled Almansoori, M.D.*, Index No. 607264/2020, Supreme Court of the State of New York, Nassau County, filed July 17, 2020.

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- *Thor Robert Rodin v. Khaled Almansoori*, Index No. 609950/2020, Supreme Court of the State of New York, Suffolk County, filed August 4, 2020.
- *AA Medical, P.C. v. Khaled Almansoori*, Docket No. 2:20-CV-04350 (NGG)(AKT), United States District Court, Eastern District of New York (originally filed in Supreme Court of the State of New York, Suffolk County on August 10, 2020).
- *AA Medical, P.C. v. Khaled Almansoori*, Docket No. 20-cv-06923 (VEC)(JLC), United States District Court, Southern District of New York, filed August 28, 2020.
- *AA Medical, P.C. v. Khaled Almansoori, M.D.*, Docket No. 2:20-CV-04431 (GRB)(AYS), United States District Court, Eastern District of New York (originally filed in Supreme Court of the State of New York, Suffolk County on August 28, 2020).

Third, beyond the six actions initiated by AA Medical or its affiliate, AA Medical is the defendant in a suit brought by Dr. Almansoori that has been pending since August 7, 2019. *See Khaled Almansoori, M.D. v. AA Medical, P.C.*, Index No. 615178/2019, Supreme Court of the State of New York, Suffolk County.

Particularly given the need to come up with a coordinated approach in all of these cases, including without limitation a possible request to consolidate some or all, it is essential that Dr. Almansoori and his counsel have sufficient time to understand the factual and legal background in connection with these matters and to submit an appropriate response whether by way of answer or otherwise.

The current due date for Dr. Almansoori's response to the Complaint in this matter is September 22, 2020. Dr. Almansoori has not previously requested any extensions of time or adjournments in this matter.

For all of the reasons set forth herein, Dr. Almansoori respectfully requests that the Court extend the time to October 14, 2020 for Dr. Almansoori to answer or otherwise respond to Plaintiff's Complaint.

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Thank you for the consideration of this matter.

Respectfully submitted,

SOKOLOFF STERN LLP

A handwritten signature in black ink, appearing to read 'AK', is written over a light gray rectangular background.

ADAM I. KLEINBERG

CC: All counsel of record (via ECF)